

CHOATE HALL & STEWART LLP

January 30, 2008

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BY HAND

The Honorable Douglas P. Woodlock
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
John Joseph Moakley U.S. Courthouse
One Courthouse Way, Suite 4110
Boston, Massachusetts 02210

Re: John Hancock Life Insurance Company, *et al.*
v. Abbott Laboratories
U.S.D.C. (Mass.) Civil Action No. 05-11150-DPW

Dear Judge Woodlock:

Pursuant to its e-mail correspondence with Mr. Lovett, John Hancock is delivering today courtesy copies of its direct testimony affidavits, deposition designations, and related exhibits, as well as exhibit lists and other pleadings filed electronically with the Court on January 28, 2008, pursuant to the Second Amended Order Regulating Non-Jury Trial. John Hancock has attached exhibit tabs to the various documents corresponding to the lists of agreed upon and disputed trial exhibits.

To facilitate the Court's review of the evidence, John Hancock notes that its affidavits and deposition designations are relevant as follows:

The following materials are relevant to the negotiation of the Research Funding Agreement generally, and to the disputed Program Compounds, ABT-518, ABT-594, and ABT-773:

Affidavits and related exhibits of Stephen Blewitt (primary negotiator for Hancock), Scott Hartz (senior Hancock employee), Lynn Klotz (consultant engaged by Hancock in 2000), and Barry Gold (trial expert engaged by Hancock); and the deposition designations and related exhibits of John Leonard (senior Abbott employee), Jeffrey Leiden (senior Abbott employee), and Philip Deemer (primary negotiator for Abbott).

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The following materials are particularly relevant to ABT-594:

Affidavit and related exhibits of William Fairweather (expert statistician engaged by Hancock); and the deposition designations and related exhibits of Jessica Hopfield (McKinsey consultant engaged by Abbott in 2000), Michael Meyer (Abbott project team member); Bruce McCarthy (Abbott project team leader), Marilyn Collicott (Abbott project team member), Bruce Rodda (expert statistician engaged by Abbott), Angela Landsberg (Abbott project team member), and James Thomas (Abbott project team member).

The following materials are particularly relevant to ABT-518:

Deposition designations and related exhibits of Azmi Nabulsi (Abbott Head of Oncology), Jessica Hopfield (McKinsey consultant engaged by Abbott in 2000); James Looman (Abbott project team member), Diane D'Amico (Abbott project team member), and Lise Loberg (Abbott project team member).

The following materials are particularly relevant to ABT-773:

Deposition designations and related exhibits of Carol Meyer (Abbott project team member), Jeanne Fox (Abbott project team member), and Stanley Bukofzer (Abbott venture head).

The following materials are relevant to Abbott's planning and spending regarding the Program Compounds:

Deposition designations and related exhibits of Keith Hendricks (Abbott employee), Thomas Lyons (Abbott employee), and Thomas Woidat (Abbott employee).

The following materials are relevant to John Hancock's attempted compliance audit of Abbott:

Affidavits and related exhibits of Christopher Martinez and Mark Hair (auditors engaged by Hancock in 2004), and deposition designations and related exhibits of Michelle Campbell (Abbott Litigation Paralegal).

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The following materials are relevant to John Hancock's damages:

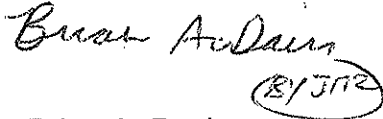
Deposition designations and related exhibits of Keith Hendricks (Abbott employee), Thomas Lyons (Abbott employee), and Thomas Woidat (Abbott employee); Affidavit and related exhibits of Alan Friedman.

Hancock has also enclosed the Affidavit of Deborah J. Dion, a Choate employee, to, among other things, authenticate documents produced in this litigation by Abbott.

John Hancock further respectfully requests that Your Honor schedule a brief pre-trial conference in advance of the March 3 trial commencement date. Hancock believes that such a conference would be helpful to the Court and to the parties in planning the presentation of evidence, addressing outstanding objections, and discussing general trial mechanics.

Thank you for your consideration.

Very truly yours,


(B/A/D)

Brian A. Davis

cc: Jeffrey I. Weinberger, Esq.
Gregory D. Phillips, Esq.
Eric J. Lorenzini, Esq.
Özge Güzelsu, Esq.